

February 21, 2015

**Via Electronic Filing**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street S.W.  
Washington, DC 20554

Re: Special Access Data Collection, WC Docket No. 05-25; RM-10593  
Hawaiian Telcom Services Company, Inc.  
FRN 0013077250

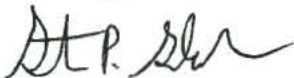
Dear Ms. Dortch:

With this letter, Hawaiian Telcom Services Company, Inc. ("HTSC") files a public version of the following essay responses in the above-referenced Special Access Data Collection proceeding, in accordance with the *Order and Data Collection Protective Order*, DA-14-1424, adopted October 1, 2014: II.A.5, II.A.8, II.A.10, II.A.11 Part 2, II.A.18, II.A.19, II.C.1, II.D.1, II.D.2, II.F.8, II.F.9, II.F.10, II.F.11, and II.F.12.

HTSC's responses have also been submitted via the Special Access Web Portal.

Please direct any questions regarding this matter to me at 808-546-3877 or at [steven.golden@hawaiiantel.com](mailto:steven.golden@hawaiiantel.com).

Sincerely,



Steven P. Golden  
Vice President, External Affairs

Attachment

Hawaiian Telcom Services Company, Inc.

Question II.A.5:

Provide a map showing the fiber routes that you (a) own or (b) lease pursuant to an *IRU* agreement that constitute your network, including the fiber *Connections* to *Locations*. In addition, include the locations of all *Nodes* used to interconnect with third party networks, and the year that each *Node* went live.

Response:

Not applicable.

REDACTED – FOR PUBLIC INSPECTION

Hawaiian Telcom Services Company, Inc.

Question II.A.8:

Explain your business rule(s) used to determine whether to build a *Connection* to a particular *Location*. Provide underlying assumptions.

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.A.10:

Provide data, maps, information, marketing materials, and/or documents identifying those geographic areas where you, or an Affiliated Company, advertised or marketed Dedicated Service over existing facilities, via leased facilities, or by building out new facilities as of December 31, 2013, or planned to advertise or market such services within twenty-four months of those dates.

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.A.11 Part 2:

Identify the business rules you rely upon to determine whether to submit a bid in response to an RFP.

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.A.18:

If you offer *Dedicated Services* pursuant to an agreement or *Tariff* that contains either a *Prior Purchase-Based Commitment* or a *Non-Rate Benefit*, then explain how, if at all, those sales are distinguishable from similarly structured *ILEC* sales of *DS1s*, *DS3s*, and/or *PBDS*.

Response:

Not applicable.

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Hawaiian Telcom Services Company, Inc.

Question II.A.19:

Provide the business justification for the *Term* or *Volume Commitments* associated with any *Tariff* or agreement you offer or have in effect with a customer for the sale of *Dedicated Services*.

Response:

Not applicable.

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Hawaiian Telcom Services Company, Inc.

Question II.C.1:

Did you submit data in connection with the State Broadband Initiative (SBI) Grant Program for 2013?

Response:

No.



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Hawaiian Telcom Services Company, Inc.

Question II.D.1: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for *Dedicated Services*. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response: Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.D.2:

Identify where your company's policies are recorded on the following *Dedicated Service*-related processes: (a) initiation of service; (b) service *Upgrades*; and (c) service *Disconnections*. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a *Tariff*, provide the specific *Tariff* section(s). If these policies are recorded in documents other than *Tariffs*, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.F.8:

II.F.8. (Optional) Explain whether the terms and conditions of any *Tariff* or contract to which you are a party for the purchase of *Dedicated Services* or the policies of any of your *Providers* constrain your ability to:

- a. Decrease your purchases from your current *Provider(s)*;
- b. Purchase services from another *Provider* currently operating in the geographic areas in which you purchase services;
- c. Purchase non-tariffed services, such as Ethernet services, from your current *Provider* of tariffed *DS1*, *DS3*, and/or *PBDS* services or from other *Providers* operating in the geographic areas in which you purchase tariffed services;
- d. Contract with *Providers* that are considering entering the geographic areas in which you purchase tariffed services;
- e. Move circuits, for example, moving your *DS1* and/or *DS3 End-User Channel Terminations* to connect to another *Transport Provider*; or
- f. Otherwise obtain *Dedicated Services* or change *Providers*.

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.F.9:

II.F.9. (Optional) If you purchase, or purchased, *Transport Service* and *End User Channel Terminations* from the same *Provider*, explain your experience with changing *Transport Service* from one *Provider* to another between January 1 and December 31, 2013 while keeping your *End User Channel Terminations* with the original *Provider*. Where appropriate, identify the *Provider(s)* in your responses below and indicate whether they are an *ILEC* or a *Competitive Provider*.

- a. How many times did you change *Transport Service* while keeping your *End User Channel Terminations* with the original *Provider*? An estimate of the number of circuits moved to a new *Transport Provider*, or the number of such changes requested, is sufficient.
- b. What was the length of time, on average, it took for the original *Provider* to complete the process of connecting your last-mile *End-user Channel Terminations* to another *Transport Provider*? An estimate is sufficient.
- c. Were you given the opportunity to negotiate the amount of time it would take to complete the process of connecting your *End User Channel Terminations* to another *Transport Provider* on a case-by-case basis? In answering this question, also describe and provide citations to the *ILEC's* or *Competitive Provider's* policies, rules or, where relevant, *Tariff* provisions, if known, explaining the transition process.
- d. How did connecting to a new *Transport Provider* impact the rate you paid for the *End User Channel Terminations* you continued to purchase from the original *Provider*?
- e. Did connecting to a new *Transport Provider* typically impact the rate you continued to pay for *Transport Service* from the original *Provider* while the change in *Transport Providers* remained pending? If so, how? What was the average percentage change in rates? For example, did you ever pay a *One Month Term Only Rate* during that time?

Response:

Not applicable.



Hawaiian Telcom Services Company, Inc.

Question II.F.10:

II.F.10. (Optional) Describe any circumstances since January 1, 2013, in which you have purchased circuits pursuant to a *Tariff*, solely for the purpose of meeting a *Prior Purchase-Based Commitment* required for a discount or *Non-Rate Benefit* from your *Provider* (i.e., you would not have purchased the circuit but for the requirement that you meet a *Volume Commitment* required for a discount or *Non-Rate Benefit* from your *Provider*). In your description, provide at least one example, which at a minimum, lists:

- a. The name of the *Provider* providing the circuits at issue;
- b. A description of the *Prior Purchase-Based Commitment*;
- c. The *Tariff* and section number(s) of the specific terms and conditions described;
- d. The number of circuits you would not have purchased but for the *Prior Purchase-Based Commitment* requirement to receive a discount or *Non-Rate Benefit*;
  - i. Of the circuits reported in II.F.10.d, how many did you not use at all?
- e. A comparison of the dollar amount of the unnecessary circuit(s) purchased versus the dollar amount of penalties your company would have had to pay under the *Prior Purchase-Based Commitment* had it not purchased and/or maintained the circuit(s), and a description of how that comparison was calculated.
- f. How many circuits were activated under the identified *Tariff* plan and not used when you initially entered into the plan? What were these unused circuits as a percent of the total circuits currently purchased under this *Tariff* plan? Indicate the percent of the total circuits currently purchased under this *Tariff* plan that exceed your *Prior Purchase-Based Commitment*.
- g. For the *Prior Purchase-Based Commitment*, indicate whether you are able to buy any *DS1s* or *DS3s* from the *Provider* outside of the identified *Tariff* plan, or are you required to make all purchases from the *Provider* pursuant to the identified *Tariff* plan?

Response:

Not applicable.

Hawaiian Telcom Services Company, Inc.

Question II.F.11:

For each year for the past five years, state the number of times and in what geographic area(s) you have switched from purchasing *End-User Channel Terminations* from one *Provider of Dedicated Services* to another.

Response:

In the past five years, Hawaiian Telcom Services Company (HTSC) [BEGIN HIGHLY  
CONFIDENTIAL] [REDACTED] [END HIGHLY  
CONFIDENTIAL]

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Hawaiian Telcom Services Company, Inc.

Question II.F.12:

II.F.12. (Optional) Explain the circumstances since January 1, 2013 under which you have paid *One Month Term Only Rates* for *DS1*, *DS3*, and/or *PBDS* services and the impact, if any, it had on your business and your customers. In your response, indicate any general rules you follow, if any, concerning the maximum number of circuits and maximum amount of time you will pay *One Month Term Only Rates*, and your business rationale for any such rules.

Response:

Not applicable.